

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ELMAGIN CAPITAL LLC,	)	
	)	
	)	Civil Action No. 2:20-cv-02576-TJS
v.	)	
	)	JURY TRIAL DEMANDED
CHAO CHEN, KARL PETTY,	)	
ENTERGRID LLC, and	)	
ENTERGRID FUND I LLC	)	
	)	
Defendants.	)	

---

**DEFENDANTS' NOTICE OF SCHEDULING CONFLICTS**

In view of the Court's Order postponing the pretrial conference and trial of these proceedings [Dkt. 156] and pending the rescheduling of these events once the Court rules on the various now-pending motions *in limine*, Defendants respectfully inform the Court of those intervals between the January 4, 2022 and June 30, 2022 during which Defendants, their counsel, clients, witnesses and/or other team members have conflicting scheduling commitments. This Notice supplements Defendants' prior Notice of Scheduling Conflicts filed on June 20, 2021 [Dkt. 89], which noted, *inter alia*, Counsels' scheduling conflict for the end of this month, as follows: December 17, 2021 through January 3, 2022 (pre-planned commitments of counsel). For the Court's convenience, Defendants also set forth the weeks in which there are no scheduling conflicts on its side.

<b>Week of 2022</b>	<b>Availability</b>	<b>Comments</b>
1/03	Unavailable	Counsel unavailable
<b>1/10</b>	<b>Available</b>	
<b>1/17</b>	<b>Available</b>	
1/24	Unavailable	Trial team members unavailable
<b>1/31</b>	<b>Available</b>	
<b>2/07</b>	<b>Available</b>	
<b>2/14</b>	<b>Available</b>	
2/21	Unavailable	Client and experts unavailable
2/28	Unavailable	Client and experts unavailable
<b>3/07</b>	<b>Available</b>	
3/14	Unavailable	Counsel, client and experts unavailable
3/21	Unavailable	Client and expert unavailable
3/28	Unavailable	Counsel, client, experts and trial team members unavailable
4/04	Unavailable	Client and experts unavailable
4/11	Unavailable	Counsel client, experts and trial team members unavailable
<b>4/18</b>	<b>Available</b>	
<b>4/25</b>	<b>Available</b>	
<b>5/02</b>	<b>Available</b>	
<b>5/09</b>	<b>Available</b>	
<b>5/16</b>	<b>Available</b>	
<b>5/23</b>	<b>Available</b>	
5/30	Unavailable	Experts and trial team members unavailable
6/06	Unavailable	Counsel, experts and trial team members unavailable
6/13	Unavailable	Experts and trial team members unavailable
6/20	Unavailable	Experts and trial team members unavailable
<b>6/27</b>	<b>Available</b>	

Defendants will of course abide whatever schedule the Court may set in the future, if the pending motions do not resolve this action. Nonetheless, Defendants respectfully request that in setting

the remaining case schedule, the Court consider the current unavailability of Defendants, counsel, other trial team members, and/or witnesses on the indicated dates.

Dated: December 6, 2021

Respectfully Submitted,

/s/ Nicole D. Galli

Nicole D. Galli (PA Id. No. 78420)

Charles P. Goodwin (PA Id No. 66500)

ND GALLI LAW, LLC

One Liberty Place

1650 Market Street

Suite 3600, #00250

Philadelphia, PA 19103

Telephone: (215) 525-9580

Facsimile: (215) 525-9585

ndgalli@ndgallilaw.com

cgoodwin@ndgallilaw.com

*Attorneys for Defendants Chao Chen,*

*Karl Petty, Entergrid LLC, and Entergrid*

*Fund I LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record are being served with a copy of this document via filing on ECF/PACER on December 6, 2021.

/s/ Nicole D. Galli

Nicole D. Galli